

AO 106 (REV 4/10) Affidavit for Search Warrant

AUSA Esther S. Mignanello, (812) 353-3323

**FILED**

MAR 28 2019

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

MAGISTRATE JUDGE, JEFFREY COLE  
UNITED STATES DISTRICT COURT

In the Matter of the Search of:

Case Number:

the US Priority Mail Express package bearing  
tracking number EL849791448US, further described  
in Attachment A

**19M223**

**APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT**

I, Stephanie Glad, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state under penalty of perjury that I have reason to believe that in the following package:

**See Attachment A**

located in the Northern District of Illinois, there is now concealed:

**See Attachment B**

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

*Code Section*

Title 21, United States Code, Section 843(b)

*Offense Description*

narcotics

The application is based on these facts:

**See Attached Affidavit,**

Continued on the attached sheet.

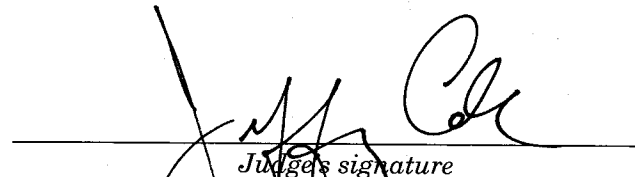
  
*Applicant's Signature*

STEPHANIE GLAD, Postal Inspector, U.S. Postal Inspection Service

*Printed name and title*

Sworn to before me and signed in my presence.

Date: March 28, 2019

  
*Judge's signature*

City and State: Chicago, Illinois

JEFFREY COLE, U.S. Magistrate Judge  
*Printed name and title*

I, Stephanie Glad, being duly sworn, state as follows:

2. This affidavit is made in support of an application for a warrant to search the US Priority Mail Express Parcel with Tracking Number EL849791448US described further in Attachment A (the “**Subject Parcel**”), for evidence, instrumentalities, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Section 843(b).

3. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence, instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

**I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL**

4. On March 27, 2019, Postal Inspectors inspected the **Subject Parcel** at USPS International Service Center in Chicago, IL in Chicago, Illinois. The **Subject Parcel** was mailed on March 27, 2019, from Northbrook, Illinois, 60062 and is addressed to "Ryan ARMSTRONG, 2129 NE 88th AVE, Portland, OR 97220," with a return address of "Elisa ALFARO, 3727 W. Eddy, Chicago, IL 60618." The **Subject Parcel** bears \$25.50 in postage, measures approximately 12 inches by 9.25 inches by 1.5 inches, and weighs approximately 1 pound and 7 ounces.

5. Postal Inspectors observed several characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance. First, Postal Inspectors ran the sender and recipient names and addresses on the **Subject Parcel** through a law enforcement database. According to the database, the sender's name (Elisa Alfaro) did associate with the address of 3727 W. Eddy, Chicago, IL 60618, but according to the database, that has not been Ms. Alfaro's address since approximately June 2017. To further investigate the sender address, Postal Inspectors called Ms. Alfaro on March 27, 2019 to ask whether she shipped a package.<sup>1</sup> The individual called confirmed to Postal Inspectors that she is Elisa Alfaro. According to Ms. Alfaro, she did not ship a package on March 27, 2019. Ms. Alfaro stated that her daughter may have shipped a package in her

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<sup>1</sup> The Postal Inspectors located Ms. Alfaro's telephone number in a law enforcement database.

name. Later the same night, Ms. Alfaro called the Postal Inspectors and informed Postal Inspectors she spoke with her daughter, and her daughter confirmed she sent a package in Ms. Alfaro's name. Ms. Alfaro also stated that her daughter stated the package contained "collectibles." Based on my training and experience, use of a different sender name, and fictitious sender addresses, can indicate that the sender does not want to be associated with the parcel.

6. In addition, Postal Inspectors observed that the **Subject Parcel** contains a signature waiver, meaning that the recipient does not have to sign for the parcel. Based on my training and experience, signature waivers can be a way for a receiver who does not want to be identified to avoid interacting with the Postal Service and being associated with the parcel.

7. Each of the characteristics I describe above can be consistent with parcels that do not contain contraband. Based on the Postal Inspectors' training and experience and based upon the nature of the conversation that the Postal Inspectors had with Ms. Alfaro, however, the combination of these characteristics led Postal Inspectors to investigate further by calling in a narcotics dog to perform further examination of the **Subject Parcel**.

8. On March 27, 2019, Postal Inspectors arranged for a Des Plaines Police Department Canine Officer and his canine partner, "Jager," to meet and examine the **Subject Parcel**. According to the Canine Officer, Jager is certified annually as a narcotics dog, and was most recently re-certified on August 7, 2018. Jager is trained

to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Jager is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Jager has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 23 occasions since January 2018, with a success rate of approximately 92%. To the best of my knowledge, the Des Plaines Police Department does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

9. On March 27, 2019, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, Postal Inspectors arranged a controlled substance detection test in the workroom area. However, upon the arrival of Jager to the workroom area, the Des Plaines Police Department Canine Officer informed Postal Inspectors that Jager was too excited to perform an inspection. Specifically, Jager damaged some of the protective containers wherein some of the parcels of the line-up were located.

10. Since Postal Inspectors were unable to complete an inspection on March 27, 2019, the next day, on March 28, 2019, Postal Inspectors arranged for a United States Customs and Border Protection Canine Officer (the "CBP Canine Officer") and his canine partner, "Hannah," to meet and examine the **Subject Parcel**. According to the CBP Canine Officer, Hannah is certified annually by United States Customs

and Border Protection as a narcotics dog. Hannah was most recently re-certified on September 6, 2018. Hannah is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Hannah is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Hannah has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 163 occasions since December 2014, with a success rate of approximately 90%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

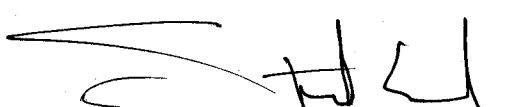
11. On March 28, 2019, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, Postal Inspectors arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 5 other parcels in the workroom area. Postal Inspectors then witnessed Hannah examine the parcels and observed Hannah alert by sitting next to the **Subject Parcel**. Hannah did not alert to any of the other parcels. The Canine Officer informed Postal Inspectors that Hannah's actions indicated the presence of narcotics and/or controlled

substances in the **Subject Parcel**.<sup>2</sup> Postal Inspectors then took custody of the **Subject Parcel**.

## II. CONCLUSION

12. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Parcel**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

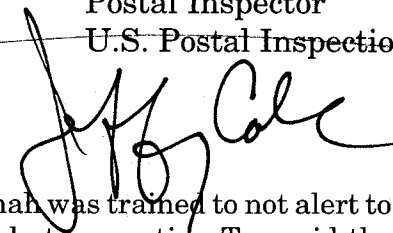
FURTHER AFFIANT SAYETH NOT.



Stephanie Glad  
Postal Inspector  
U.S. Postal Inspection Service

Subscribed and sworn

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<sup>2</sup> According to the CBP Canine Officer, Hannah was trained to not alert to the scent of another canine, because she was trained to alert only to narcotics. To avoid the risk of false alerts, Hannah is provided with "conflict training," where Hannah is trained against alerting to innocuous items that are either commonly found in the workplace or commonly found around narcotics. For example, Hannah has been trained against alerting to Mylar bags, and other packaging that is commonly used to wrap narcotics, if those materials have not been in contact with narcotics. In addition, multiple canine partners are trained on the same object, or the same set of objects, which assures a canine partner like Hannah against does not alert simply to the presence or scent of another canine.

before me this 28th day of March, 2019



Honorable JEFFREY COLE  
United States Magistrate Judge



**ATTACHMENT A**

**DESCRIPTION OF ITEM TO BE SEARCHED**

The United States Priority Mail Express Parcel with Tracking Number EL849791448US, bearing a return address of "Elisa ALFARO, 3727 W. Eddy, Chicago, IL 60618," and a recipient address of "Ryan ARMSTRONG, 2129 NE 88th AVE, Portland, OR 97220." The **Subject Parcel** measures approximately 12 inches by 9.25 inches by 1.5 inches, weighs approximately 1 pound and 7 ounces, and bears \$25.50 in postage.

**ATTACHMENT B**

**LIST OF ITEMS TO BE SEIZED**

Evidence, instrumentalities and contraband concerning violation of Title 21,  
United States Code, Section 843(b), as follows:

1. Controlled substances.
2. Packaging for controlled substances.
3. Items associated with controlled substances.
4. Items that identify the sender or receiver of the parcel.
5. United States currency.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

the US Priority Mail Express package bearing  
tracking number EL849791448US, further described  
in Attachment A

Case Number:

**19M223**

**SEARCH AND SEIZURE WARRANT**

To: Stephanie Glad and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Northern District of Illinois:

**See Attachment A**

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal:

**See Attachment B**

**YOU ARE HEREBY COMMANDED** to execute this warrant on or before April 11, 2019 in the daytime (6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate Judge.

*305 PM*

Date and time issued: March 28, 2019

City and State: Chicago, Illinois

*Jeffrey Cole*  
\_\_\_\_\_  
Judge's signature

JEFFREY COLE, U.S. Magistrate Judge  
Printed name and title

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**Return**

Case No:

Date and Time Warrant Executed:

Copy of Warrant and Inventory Left With:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*\_\_\_\_\_  
*Printed name and title*

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